IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

UNITED STATES OF AMERICA	
v.	NO. 3:20-MJ-000782-BN
JASON SHEROD BALDWIN	
MOTION FOR I	
The United States moves for pre-trial de	
•	tention of defendant, suson shered
Baldwin pursuant to 18 U.S.C. § 3142.	
1. Eligibility of Case. This case is eligi	ible for a detention order because the case
involves (check all that apply):	
Crime of violence (18 U.S.	C. §3156);
Maximum sentence life im	prisonment or death
10 + year drug offense	
Felony, with two prior con-	victions in above categories
Serious risk defendant will	flee
Serious risk obstruction of	justice
X Felony involving a minor	victim
Felony involving a firearm, of dangerous weapon	lestructive device, or any other
Felony involving a failure t	to register (18 U.S.C. § 2250)
2. Reason for Detention. The Court sho	ould detain defendant because there are no
conditions of release that will reasonably assure	e (check one or both):
X Defendant's appearance a	s required
X Safety of any other person and the community	

3. Rebuttable Presumption. The United States will invoke the rebuttable	
presumption against defendant because:	
Probable cause to believe defendant committed 10+ year drug offense or firearms offense, 18 U.S.C.§ 924(c)	
Probable cause to believe defendant committed a federal crime of terrorism, 18 U.S.C. § 2332b(g)(5)	
X Probable cause to believe defendant committed an offense involving a minor, 18 U.S.C. §§ 1201, 2251	
Previous conviction for "eligible" offense committed while on pretrial bond	
4. Time for Detention Hearing. The United States requests the Court conduct the	
detention hearing,	
At first appearance	
x After continuance of 2 days (not more than 3).	
DATED this 29th day of July 2020.	
Respectfully submitted,	
ERIN NEALY COX UNITED STATES ATTORNEY	
/s/ Nicole Dana NICOLE DANA Assistant United States Attorney Texas State Bar No. 24062268 1100 Commerce Street, Third Floor Dallas, Texas 75242-1699 Telephone: 214-659-8694 Facsimile: 214-659-8800 Email: nicole.dana@usdoj.gov	